

COVID-19 Preparedness & Response Plan For Lower and Medium Exposure Risk Employers ONLY

✓ General

The following COVID-19 preparedness & response plan has been established for Gibraltar School District in accordance with MIOsha Emergency Rules for Coronavirus disease 2019 (COVID-19). The purpose of this plan is to minimize or eliminate employee exposure to SARS-CoV-2. Additionally, before the most recent mandate of a business MIOsha plan, all School districts must follow the MI Safe Schools Return to School Road Map and the Fall 2020 COVID-19 Preparedness and Response Plan. The Fall 2020 COVID-19 Preparedness and Response Plan was approved by Wayne RESA and MDE and provides all mandated mitigation measures for all employees for Gibraltar School District. Please follow these links to see these already mandated plan.

https://www.gibdist.net/uploaded/About/GSD_82290_MAISA_GELN_COVID-19_Preparedness_and_Response_Plan.pdf

https://www.michigan.gov/documents/whitmer/MI_Safe_Schools_Roadmap_FINAL_695392_7.pdf

The Emergency Rules have general safeguards applicable for all workplaces and specific safeguards for certain industries. The Human Resources Specialist has read these emergency rules carefully, developed the safeguards appropriate to Gibraltar School District based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

Gibraltar School District has designated one or more worksites supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisor(s) are the School/District Administrators. The supervisors will remain on-site at all times when employees are present on site. An on-site employee may be designated to perform the supervisory role.

The plan will be made readily available to our employees and their representatives. The

plan will be made available via www.gibdist.net.

✔ Exposure Determination

Gibraltar School District has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to SARS-CoV-2. The Human Resources Specialist was responsible for the exposure determination.

Gibraltar School District has determined that its employees' jobs fall into only the lower exposure and medium exposure risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19:

- **Lower Exposure Risk Jobs**. These jobs do not require contact with known or suspected cases of COVID-19 nor frequent close contact (for example, within six feet) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers. Examples are small offices, small manufacturing plants (less than 10 employees), small construction operations (less than 10 employees), and low-volume retail establishments, provided employees have infrequent close contact with coworkers and the public.
- **Medium Exposure Risk Jobs**. These jobs are those that require frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. Examples are most jobs at manufacturing plants, construction sites, schools, high-volume retail settings, and other high-population-density work environments.

The Human Resources Specialist verifies that Gibraltar School District has no high-risk exposure jobs. High exposure risk jobs have high potential for exposure to known and suspected cases of COVID-19. Examples are most jobs in healthcare, medical transport, nursing homes and residential care facilities, mortuaries, law enforcement, and correctional facilities. This sample plan is not intended for employers who have high exposure risk jobs.

Gibraltar School District has categorized its jobs as follows:

NOTE: Some jobs may have more than one type of exposure risk depending on the task or qualifying factors.

Job/Task	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (Ex. No Public Contact, Public Contact)
Custodian	Medium	Public Contact
Maintenance	Medium	Public Contact
Food Service	Medium	Public Contact
Transportation	Medium	Public Contact
Support Staff	Medium	Public Contact
Teacher	Medium	Public Contact
Administration	Medium	Public Contact
Clerical	Medium	Public Contact

✔ Engineering Controls

Gibraltar School District has implemented feasible engineering controls to minimize or eliminate employee exposure to SARS-CoV-2. Engineering controls involve isolating employees from work-related hazards using ventilation and other engineered solutions. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on worker behavior and can be the most cost-effective solution to implement.

For lower exposure risk jobs, new engineering controls are not required. For medium exposure risk jobs, engineering controls can include:

- Installing physical barriers (such as clear plastic sneeze guards) between coworkers or between workers and customers.
- Installing a drive-through window for customer service.
- Increasing the amount of ventilation in the building.
- Increasing the amount of fresh outdoor air that is introduced into the building.

The Director of Operations will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary.

The following engineering controls have been implemented:

Job/Task	Engineering Control
Teachers	Plexiglass on desks
Clerical Staff	Plexiglass barriers
All Staff	Modifying break/lunch area spaces, socially distancing

For additional mitigation efforts, please see:

https://www.gibdist.net/uploaded/About/GSD_82290_MAISA_GELN_COVID-19_Preparedness_and_Response_Plan.pdf

https://www.michigan.gov/documents/whitmer/MI_Safe_Schools_Roadmap_FINAL_695392_7.pdf

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. The Human Resources Specialist will be responsible for seeing that the correct administrative controls are chosen, implemented and maintained for effectiveness.

The following administrative controls have been established for Gibraltar School District:

(Choose the controls below that are feasible for your workplace. Delete the controls that are not feasible or applicable. Add additional rows for other feasible administrative controls that will be implemented. In the first column, indicate which jobs or tasks will use each administrative control.)

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All employees	Maintain at least six feet from everyone on the worksite.
All employees	Use ground markings, signs, and physical barriers to prompt employees to remain six feet from others.
All employees (if determined that job duties may be done remotely)	Promote remote work (telecommuting) to the fullest extent possible.
All employees (if determined that job duties may be done during flexible hours)	Promote flexible work hours (staggered shifts) to minimize the number of employees in the facility at one time.

All employees (if determined that job duties may be done while alternating days/shifts)	Establish alternating days or extra shifts to reduce the total number of employees in the facility at a given time.
All employees	Restrict business-related travel for employees to essential travel only.
Administration	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.
All employees	Restrict the number of customers in the establishment at any given time.
All employees	Minimize the sharing of tools, equipment, and items.
All employees	Provide employees with non-medical grade face coverings (cloth face coverings).
All employees	Require employees to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
All employees	Require customers and the public to wear cloth face coverings.
All employees	Keep customers informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again. Encourage sick customers to use drive-through services, curbside pickup, or home delivery.
All employees	Provide customers and the public with tissues and trash receptacles.
All employees	Encourage customers to place orders for merchandise or services through the phone or web.
All employees	Promote curbside and home delivery to minimize contact with customers.
All employees	Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
All employees	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.

Hand Hygiene

The Director of Operations will be responsible for seeing that adequate handwashing

facilities are available in the workplace and that regular handwashing is required. Frequency of such handwashing will be determined in part by factors such as when and how often the employees' hands are potentially exposed to SARS-CoV-2. When handwashing facilities are not available, Gibraltar School District shall provide employees with antiseptic hand sanitizers or towelettes. Gibraltar School District will provide time for employees to wash hands frequently and to use hand sanitizer.

Gibraltar School District shall promote frequent and thorough hand washing, including by providing workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, provide antiseptic hand sanitizers or alcohol-based hand towelettes containing at least 60 percent alcohol.

✔ Disinfection of Environmental Surfaces

Gibraltar School District will increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (for example, door handles), paying special attention to parts, products, and shared equipment (for example tools, machinery, vehicles). Gibraltar School District will make cleaning supplies available to employees upon entry and at the worksite.

The Director of Operations will be responsible for seeing that environmental surfaces in the workplace are cleaned and disinfected. Frequency of such disinfection will be determined in part by factors such as when and how often the environmental surfaces are potentially exposed to SARS-CoV-2. When choosing cleaning chemicals, Gibraltar School District will consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against SARS-CoV-2 based on data for harder to kill viruses. The manufacturer's instructions for use of all cleaning and disinfection products will be strictly adhered to.

The following is a list of environmental surfaces, methods used to disinfect, and the frequency of such disinfection: For a more detailed list, please follow the link below:

https://www.gibdist.net/uploaded/About/GSD_82290_MAISA_GELN_COVID-19_Preparedness_and_Response_Plan.pdf

Surface	Method/Disinfectant Used	Schedule/Frequency
Classroom	Fight Bac and Virex II 256 – Sprayed and wiped with paper towel	After every class period and nightly

Bathrooms	Virex II 256 – Sprayed and wiped with paper towel	Minimum every 4 hours, and nightly
Buses	Virex II 256 – Sprayed and wiped with paper towel	After every group of students, and nightly.

Gibraltar School District will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in a work area. In the interim, that work area will be temporarily closed, and employees will be sent home or relocated. The Director of Operations will be responsible for seeing that this protocol is followed, and in conjunction with:

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https://www.michigan.gov/documents/whitmer/MI_Safe_Schools_Roadmap_FINAL_695392_7.pdf

The following methods will be used for enhanced cleaning and disinfection:

Any time enhanced disinfection is needed additional spraying with Electrostatic sprayer will be performed of entire room, in accordance with:

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✔ Personal Protective Equipment (PPE)

Gibraltar School District will provide employees with the types of personal protective equipment, including respirators if necessary, for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job. The employer must follow current CDC and OSHA guidance for personal protective equipment, as outlined in the Mi Safe Schools Return to School Roadmap.

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All types of PPE are to be:

- Selected based upon the hazard to the worker.

- Properly fitted and periodically refitted as applicable.
- Consistently and properly worn.
- Regularly inspected, maintained, and replaced, as necessary.
- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

Gibraltar School District will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE). Gibraltar School District will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. Gibraltar School District will consider face shields when employees cannot consistently maintain three feet of separation from other individuals in the workplace.

Gibraltar School District must follow the written, mandated requirements from the Michigan Mi Safe Start Return to School Roadmap. Please see the links below:

https://www.michigan.gov/documents/whitmer/MI_Safe_Schools_Roadmap_FINAL_695392_7.pdf

<https://www.waynecounty.com/covid19/back-to-school.aspx>

The following type(s) of PPE have been selected for use:

Job/Task	PPE
All staff	Surgical grade masks, face shields, vinyl gloves, etc.

Health Surveillance

Gibraltar School District will conduct a daily entry self-screening protocol for all employees or contractors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with, if possible, a temperature screening. The Human Resources Specialist will be responsible for ensuring that all required health surveillance provisions are performed. Gibraltar School District must follow the guidance of the Wayne County Return to School Roadmap:

<https://www.waynecounty.com/covid19/back-to-school.aspx>

As workers enter the place of employment at the start of each work shift, Gibraltar School District will have employees self-screen for COVID-19. Gibraltar School District will have employees complete a questionnaire covering the signs and symptoms of COVID-19 and their exposure to people with suspected or confirmed COVID-19. When obtainable, a no-touch thermometer will be used for temperature screening of employees. Gibraltar School District will similarly screen contractors, suppliers, and any other individuals entering the worksite.

Gibraltar School District must follow the guidance of the Wayne County Return to School Roadmap:

<https://www.waynecounty.com/covid19/back-to-school.aspx>

Employees have been directed to promptly report any signs and symptoms of COVID-19 to the Human Resources Specialist before and during the work shift. Gibraltar School District has provided employees with instructions for how to make such a report to the employer.

The specific instructions for employee reporting signs and symptoms of COVID-19 are as follows:

Employees should complete daily survey to document possible symptoms. If an employee becomes ill while at the workplace, they are to immediately notify supervisor and the HR Specialist.

Gibraltar School District will physically isolate any employees with known or suspected COVID-19 from the remainder of the workforce, using measures such as, but are not limited to:

- Not allowing known or suspected cases to report to or remain at their work location.
- Sending known or suspected cases to a location (for example, home) where they are self-isolating during their illness.
- Assigning known or suspected cases to work alone at the location where they are self-isolating during their illness.

Gibraltar School District will not discharge, discipline, or otherwise retaliate against employees who stay at home or who leave work when they are at particular risk of infecting others with COVID-19.

When an employee is identified with a confirmed case of COVID-19, the Nursing Services Liaison will notify the local public health department immediately, and any co-workers, contractors, or suppliers who may have come into contact with the person who is the confirmed case of COVID-19, within 24 hours. When notifying coworkers, contractors, and suppliers, Gibraltar School District will not reveal the name or identity of the confirmed case.

Gibraltar School District will allow employees with a confirmed or suspected case of COVID-19 to return to the workplace only after they are no longer infectious according to the latest protocols from the Wayne County Health Department Return to School Roadmap.

✔ Training

The Nursing Services Liaison and other trained designees shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Gibraltar School District will train workers on, at a minimum:

- Workplace infection-control practices.
- The proper use of personal protective equipment.
- Steps the employee must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
- How to report unsafe working conditions.

The Nursing Services Liaison and other trained designees shall create a record of the training. Records should include the name of the employee(s) trained and the date of the training.

✔ Recordkeeping

Gibraltar School District will maintain records of the following requirements:

- Training. The employer shall maintain a record of all COVID-19 employee training.
- Screening protocols. The employer shall maintain a record of screening for each employee or visitor entering the workplace.
- When an employee is identified with a confirmed case of COVID-19, record

when the local public health department was notified; as well as any co-workers, contractors, or suppliers who may have come into contact with the person who was the confirmed case of COVID-19.

The Human Resources Specialist and Nursing Services Liaison will ensure that the records are kept.

FREE onsite consultation service for employers

To help employers better understand and voluntarily comply with the MIOSHA Act, free Onsite Consultation programs are available to help small employers identify and correct potential safety and health hazards.

Michigan Occupational Safety and Health Administration
Consultation Education and Training Division
530 W. Allegan Street, P.O. Box 30643
Lansing, Michigan 48909-8143

For further information or to request consultation, education and training services call 517-284-7720 or visit our website at www.michigan.gov/miosha.

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